Document 26, Wayne Ross, Richland, WA
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HLW & FD

EIS PROJECT - AR/PF
Control # DC-26

HLW EIS Web Comments

From: HLWFDEIS Web Site
Sent: Friday, February 18, 2000 9:29 AM
To: web@jason.com
Cc: web_archive@jason.com
Subject: HLW EIS Web Comment

Name: Wayne Ross
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Date Entered: {ts '2000-02-18 09:29:05'}
Comment:
I have over 25 years experience dealing with HLW in the DOE complex (including the INEEL wastes) and am commenting from that perspective, but as a private citizen.

I prepared a comment a few minutes ago, but it apparently got lost in our server. I will try again with this comment.

1) Learn from the past. One of the most costly decisions make at Hanford was to shut down PUREX before it has processed all of the spent fuel. The management of that fuel is now costing the taxpayer over a $1 billion and the price will go up when it is sent to the repository. It could easily become a $2B mistake. The implications of this comment is keep the calciner running and process off all of the liquid wastes. Get them into a stable and low dispersible solid form.
26-1 III.C(1) 26-2 VII.D(6) 26-3 II.E(4)

2) Make the decision to immobilize for disposal soon. I also favor use of the Hanford future vitrification facility. The sooner the decision the easier and low cost will be the introduction of the waste into the process. I have not studied the specifics, but I suspect that there will be the opportunity to reduce the total volume of wastes if the feed streams from Hanford and INEEL are blended. Some of the constituents of the INEEL calcine (Zr for example) will increase the chemical durability of the Hanford Glass. The large volume of the Hanford waste will dilute the low solubility in glass components in the INEEL calcine (e.g. Zr again).
26-4 II.E(4)

Document 27, State of Oregon (Ken Niles), Portland, OR
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EIS PROJECT - AR/PF
Control # DC-27

Preliminary Comments of the State of Oregon
on the Idaho High-Level Waste and Facilities Disposition
Draft Environmental Impact Statement
February 22, 2000

Good evening, I am Ken Niles, Deputy Administrator of the Oregon Office of Energy's Nuclear Safety Division. We are the lead state agency for Hanford issues.

We appreciate the opportunity to provide comments to the U.S. Department of Energy and the State of Idaho on their draft Environmental Impact Statement concerning the treatment of high-level radioactive waste at the Idaho National Engineering and Environmental Laboratory. Our comments focus solely on one element of the draft EIS – the proposal to bring Idaho's high-level waste to Hanford for vitrification. Oregon is directly impacted by major activities at Hanford.

27-1 II.E(5) It is Oregon's position that it is premature to consider bringing Idaho waste to Hanford for two reasons: one, Hanford does not currently have a vitrification facility; and two, once it does, there is a pressing need to treat Hanford's waste as soon as possible. These discussions should not occur until after Hanford's waste is completely treated. Under current schedules, that means about 45 years from now.

27-2 II.E(4) We recognize the financial constraints that drive this proposal to bring Idaho waste to Hanford rather than build additional treatment facilities at Idaho. We believe it may make sense to consider this proposal at some future time. However, even then – sometime in the distant future – the State of Oregon would not consider treatment of Idaho's high-level waste at Hanford unless the following conditions were met: use this statement as a preface to each of the next 5 comments

- Idaho waste would not be treated at Hanford until all of Hanford's high-level waste is treated.
- Idaho waste would not come to Hanford until it is time for treatment.
- Upon vitrification of Idaho waste, it must then be returned to Idaho or to a national repository, if one is available. It must not remain in storage at Hanford.
- The transportation of this waste must adhere to enhanced transportation safety protocols developed by Western states for shipments to the Waste Isolation Pilot Plant.
- Oregon must be allowed to participate fully in Hanford decision-making meetings in order to assure these conditions are met.

Let me elaborate on each of these conditions.

27-3 II.E(5) 27-4 II.E(1) **Idaho waste cannot be treated at Hanford until all of Hanford's high-level waste is treated.** Hanford has 54 million gallons of high-level waste stored in 177 aging underground tanks. The waste in these tanks, along with more than one million gallons that have already leaked from failing tanks, poses a direct threat to the Columbia River. The current timetable calls for Hanford's pre-treatment and high-level vitrification facilities to be operational in 2009, but that only 10 per cent of Hanford's high-level waste will be treated by 2018. At that point, waste will still remain – waiting for treatment – in 147 of Hanford's 149 single shell tanks.

EXHIBIT #2
HLW F&D EIS
Portland, OR
February 22, 2000
Name: Ken Niles - State of Oregon